

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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PHILIP CALDERON, FARSHAD PINCHASI,  
ALLISON FIELDS, and DANA FOLGAR,  
*on their own behalf and on behalf of all others  
similarly situated,*

Civ. Action No.:  
**25-cv-02320 (ARR)(MMH)**

*Plaintiffs,*  
– *against* –

PUBLIC PARTNERSHIPS, LLC,

*Defendant.*

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**PLAINTIFFS AND DEFENDANT' S JOINT STIPULATION TO ENLARGE TIME TO  
RESPOND TO FIRST AMENDED COMPLAINT AND ANY SUBSEQUENT MOTION  
TO DISMISS**

Plaintiffs Philip Calderon, Farshad Pinchasi, Allison Fields, and Dana Folgar, on their own behalf and on behalf of all others similarly situated and Defendant Public Partnerships, LLC, by and through their undersigned counsel, hereby jointly stipulate with Defendant Public Partnerships, LLC as follows:

Whereas, Plaintiffs filed a Complaint against Defendant, Public Partnerships, LLC on April 25, 2025;

Whereas, Plaintiffs filed a First Amended Complaint against Defendant on May 28, 2025;

Whereas, summons was issued on May 30, 2025, and served via the New York Secretary of State pursuant to Fed. R. Civ. P. 4 and N.Y. Limited Liability Company L. § 303 on June 3, 2025, *see* ECF No. 15;

Whereas, pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), Defendant's response to the First Amended Complaint is due 21 days after service, on or before June 24, 2025;

Whereas, pursuant to Fed. R. Civ. P. 12(b), Plaintiffs' response to a potential motion to dismiss (in whole or in part) by Defendant would be due 14 days after filing, on or before July 8, 2025 if a motion to dismiss were filed on June 24, 2025;

Whereas, pursuant to this Court's Individual Rule III(A)(i), the undersigned counsel conferred and have jointly stipulated as follows:

- (i) To enlarge Defendant's time to respond to the First Amended Complaint by 45 days, i.e., to August 8, 2025;
- (ii) That Defendant waives any objections to service of process and personal jurisdiction;
- (iii) To enlarge Plaintiffs' time to respond to any potential motion to dismiss made by Defendant's to 41 days, in light of pre-planned vacation schedules, such that Plaintiffs' opposition to any such motion, if one is filed on August 8 would be due September 18, 2025;
- (iv) To enlarge Defendants' time to file a reply to any such opposition to 13 days, such that Defendants' reply brief would be due October 1, 2025; and

Whereas, the parties have not previously requested a request for extension of these deadlines.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED that:

- Defendant's response to Plaintiffs' First Amended Complaint shall be due on or before August 8, 2025;
- In the event Defendant files a motion to dismiss, Plaintiffs' opposition to that potential motion shall be due 41 days after any such motion is filed, on or before September 18, 2025, and Defendant's reply will be due 13 days after any such opposition is filed, on or before October 1, 2025.

Dated: June 24, 2025  
New York, New York

**KATZ BANKS KUMIN LLP**

By:



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*Counsel for Plaintiffs*

**IT IS SO ORDERED:**

Dated: \_\_\_\_\_

**PIERSON FERDINAND LLP**

By:



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*Counsel for Defendant*

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HONORABLE ALLYNE R. ROSS  
United States District Court Judge